

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

TEJA RAVI,)	
)	
Plaintiff,)	
)	No. 20-1237C
v.)	(Senior Judge Firestone)
)	
)	
THE UNITED STATES,)	
)	
Defendant.)	

AFFIDAVIT OF ANGELA L. AVERY, UNIT CHIEF, INVESTIGATIONS & OPERATIONS

I, ANGELA L. AVERY, hereby declare that, to the best of my knowledge, information, and belief, and under the penalty of perjury, the following is true and correct:

- 1) My name is Angela Lynn Avery and I serve as the Unit Chief for the U.S. Immigration and Customs Enforcement (ICE) Office of Acquisition Management (OAQ) Investigations and Operations Support Dallas Office.
- 2) I have been an ICE employee for over seventeen (17) years and all my time with ICE has been in the OAQ Dallas Office as the Senior Supervisory Contracting Officer. I am the Unit Chief for the OAQ Investigations and Operations Support Dallas (IOSD) office and provide procurement support for goods and services required by the Homeland Security Investigations (HSI) program office.
- 3) I am a Chief of Contracting Office (COCO) as designated by the ICE Head of Contracting Activity and I am a Warranted Contracting Officer holding an unlimited warrant. Both the COCO authority and Contracting Officer authority are designated by the ICE Head Contracting Agent (HCA), who is delegated procurement authority from the U.S. Department of Homeland Security (DHS) Chief Procurement Officer. As a Warranted Contracting Officer, I have the authority to enter into, administer, and terminate procurement actions.
- 4) In accordance with the Federal Acquisition Regulations, the only individuals that have the authority to contractually bind the Government are:
 - a. Warranted Contracting Officers up to their Warrant limit, and
 - b. Purchase Cardholders up to the micro-purchase threshold.
- 5) As the Unit Chief for IOSD, I am the direct supervisor over the ICE National Purchase Card Program Office and checked with the Purchase Card Program Manager, to verify if any of the individuals in the RAVI case possessed purchase cards. The Purchase Card Program Manager is responsible for maintaining the purchase card holder database and certifies individuals that

are approved purchase card holders. She verified that none of the ICE employees listed in the RAVI case are approved purchase card holders.

- 6) As the Unit Chief for IOSD, I am a senior level acquisition manager in OAQ and checked with the OAQ Acquisition Management Support Unit Chief to verify if any of the individuals in the RAVI case possessed warrants. The OAQ Acquisition Management Support Unit Chief is responsible for overseeing the contracting officer warrants issued by OAQ on behalf of the HCA. She provided me with a spreadsheet that contained all the names of ICE warranted contracting officers. I reviewed that spreadsheet against the list of ICE employees in the RAVI case and verified none of the individuals are warranted contracting officers.
- 7) As the Unit Chief for IOSD, I have researched whether anyone associated with the University of Farmington undercover operation had authority to enter into a contract to provide educational services. I can confirm through my due diligence, no agent or officer, absolutely no one, associated with University of Farmington had authority to enter into a contract to provide educational services.

I declare under penalty of perjury the foregoing is true and correct.

June 22, 2021

Executed on this date

Angela L. Avery, Unit Chief
Investigations & Operations
U.S. Immigration and Customs Enforcement
Dallas, Texas